

#### REMARKS

**[0002]** Applicant respectfully requests reconsideration and allowance of all of the claims of the application. The status of the claims is as follows:

- Claims 1-10 and 18-20 are currently pending
- Claims 11-17 and 21 are canceled herein
- Claims 1-4, 6, 8, 10 and 18 are amended herein

**[0003]** Support for the amendments to claims 1, 6, and 18 may be found in the specification at least at Paragraph 13, Lines 1-22.

#### Cited Documents

**[0004]** The following documents have been applied to reject one or more claims of the Application:

- Vaitekunas: Vaitekunas, Jeffrey J., U.S. Patent Application Publication No. 2003/0004806
- Firester: Firester et al, U.S. Patent No. 6,611,241
- Li: Li et al, "Building and Using A Scalable Display Wall System", IEEE Computer Graphics and Applications, July/August 2000.
- Ellis: Ellis Jr. et al, U.S. Patent No. 4,562,450
- Sakai: Sakai et al, U.S. Patent No. 5,680,525

### § 103 Rejections

**[0005]** Claims 1-2 and 6 stand rejected under 35 U.S.C. § 103(a) as allegedly being obvious over Vaitekunas, in view of Firester.

#### Independent Claim 1

**[0006]** Applicant submits that the Office has not made a *prima facie* showing that independent Claim 1 is obvious over Vaitekunas in view of Firester. Applicant submits that the cited documents do not teach or suggest the following features of this claim. Claim 1, as amended, recites (with emphasis added):

1. A method comprising:

advertising, from a *primary terminal client* computer coupled to a plurality of small displays, the availability of a contiguous large display to a *terminal server*, the large contiguous display comprising the plurality of small displays *that are controlled by thin clients*;

receiving a *remote terminal services environment* over a network from the terminal server, the remote terminal services environment formatted for display on the large contiguous display that comprises the plurality of small displays;

receiving configuration information respectively from a plurality of *thin clients*, each of the received configuration information including attribute information associated with a small display that is part of the large contiguous display;

reformatting the *remote terminal services environment* on the primary terminal client for display on a number of the plurality of small displays that are part of the large contiguous display;

distributing reformatted *remote terminal services environment* from the primary terminal client to at least some of the small displays; and  
managing an *active cursor* that is displayed on the large contiguous display *to pass the active cursor from one of the small displays to another of the small displays in response a mouse movement received by the primary terminal client.*

**[0007]** First, Vaitekunas does not teach or suggest, "advertising, from a *primary terminal client computer* coupled to a plurality of small displays, the availability of a contiguous large display to a *terminal server*, the large contiguous display comprising the plurality of small displays *that are controlled by thin clients*," as recited in claim 1. (Emphasis added).

**[0008]** Instead, Vaitekunas discloses a "display controller 30" that controls the display of "dynamic content 70" on the "content display unit 25". (Vaitekunas, Paragraph 40-42). Accordingly, the "display controller 30" of Vaitekunas, at best, may be equivalent to a "thin client", and not equivalent to the "*terminal client computer*" that advertises to availability of the large display to the "terminal server", as recited in claim 1.

**[0009]** Moreover, even assuming, *in arguendo*, that the "display controller 30" is equivalent to the "primary terminal client computer" as recited in claim 1, Vaitekunas nevertheless still does not disclose that its "display controller 30" is capable of advertising "the availability of a contiguous large display to a *terminal server*," as further recited in claim 1.

**[0010]** Instead, while Vaitekunas disclose that its servers 40-42 are capable of providing "dynamic-content 70", Vitekunas does not disclose that the servers 40-42 are

"terminal servers" capable of providing a "*remote terminal services environment*," as further recited in claim 1. (Vaitekunas, Paragraph 40, Lines 18-22).

**[0011]** Second, Vaitekunas does not teach or suggest, "receiving a *remote terminal services environment* over a network from the *terminal server*, the remote terminal services environment formatted for display on the large contiguous display that comprises the plurality of small displays," as recited in claim 1. (Emphasis added).

**[0012]** Instead, Vaitekunas discloses "an advertising bill board system 20" that displays advertisements on its "content display units 25" via "display controllers" 26-29. (Vaitekunas, Paragraph 40, Lines 1-10). However, since advertisements are not equivalent to a "remote terminal services environment", Vaitekunas does not disclose, as recited in claim 1, "receiving a *remote terminal services environment* over a network from the *terminal server*."

**[0013]** Third, as stated above, Vaitekunas does not teach or suggest, "receiving a *remote terminal services environment* over a network from the *terminal server*, as recited in claim 1. Accordingly, Vaitekunas also cannot teach or suggest, as further recited in claim 1 (with emphasis added):

reformatting the *remote terminal services environment* on the primary terminal client for display on a number of the plurality of small displays that are part of the large contiguous display;  
distributing reformatted *remote terminal services environment* from the primary terminal client to at least some of the small displays.

**[0014]** Fourth, Vaitekunas does not teach or suggest, "managing an active cursor that is displayed on the large contiguous display *to pass the active cursor from one of the*

*small displays to another of the small displays in response a mouse movement received by the primary terminal client," as recited in claim 1. (Emphasis added).*

**[0015]** Instead, the disclosure Vaitekunas is related to displaying "dynamic content" 70 on one or more "content display units 25". However, Vaitekunas is silent with respect to managing the display of a cursor on a "large contiguous display" that includes small displays. Thus, Vaitekunas also does not teach or suggest this element of claim 1.

**[0016]** Moreover, the deficiencies of Vaitekunas with respect to these elements are not remedied by Firester. As noted by the Office, Firester discloses the reformatting and distribution of video data to one or more displays. (Office Action, Page 3, Paragraphs 4-5; Firester, Abstract). However, Firester is silent with respect to the above recited elements of claim 1.

**[0017]** Consequently, for at least the foregoing reasons, the cited documents do not teach or suggest all of the elements and features of claim 1. Accordingly, Applicant respectfully requests that the rejection of this claim be withdrawn.

### Dependent Claim 2

**[0018]** Claim 2 ultimately depend from independent claim 1. As discussed above, claim 1 is allowable over the cited documents. Therefore, claim 2 is also allowable over the cited documents for at least its dependency from an allowable base claim. Claim 2 may also be allowable for the additional features that it recites.

Independent Claim 6

[0019] Applicant submits that the Office has not made a *prima facie* showing that independent Claim 1 is obvious over Vaitekunas in view of Firester. Claim 6, as amended, recites (with emphasis added):

6. A processor-readable medium storing processor-executable instructions configured for:

advertising, from a *primary terminal client* coupled to a plurality of small displays, the availability of a large contiguous display to a terminal server, the large contiguous display comprising the plurality of small displays *that are controlled by thin clients*;

receiving, at the *primary terminal client*, configuration information respectively from a plurality of thin clients, each of the received configuration information including attribute information associated with a separate small display that is part of the large contiguous display;

receiving a *remote terminal service environment* over a computer network at the intermediate computer, the video data configured for display on the large contiguous display;

reconfiguring the *remote terminal service environment* for display on the small displays in accordance with the configuration information; and

sending reconfigured *remote terminal service environment* from the *primary terminal client* to the small displays.

[0020] Specifically, Applicant incorporates the reasoning presented above in response to the rejection of claim 1 under 35 U.S.C. § 103(a) to the extent that the claims recite similar subject matter. Accordingly, Applicant respectfully submits that

Vaitekunas and Firester does not contain teachings or suggestions related to the above emphasized features and elements of claim 6.

**[0021]** Claims 4-5, 7, 9-10 and 18-20 stand rejected under 35 U.S.C. § 103(a) as allegedly being obvious over Vaitekunas, in view of Firester and further in view of Li.

*Dependent Claims 4-5*

**[0022]** Claims 4-5 ultimately depend from claim 1. Accordingly, Applicant incorporates the reasoning presented above in response to the rejection of claim 1 under 35 U.S.C. § 103(a). Thus, Applicant respectfully submits that the cited documents of Vaitekunas and Firester do not teach or suggest every element of claim 1.

**[0023]** Moreover, the deficiencies of the cited documents to Vaitekunas and Firester are not remedied by Li. Li discloses "virtual display" wall that can accommodate the contents drawn on a regular CRT. (Li, Page 34, Column 2, Paragraph 1). However, Li is silent with respect to the elements of claim 1 that are not taught or suggested by Vaitekunas and Firester. Consequently, since claim 1 is allowable over the cited documents, Claims 4-5 are also allowable over the cited documents for at least their dependency from an allowable base claim. These claims may also be allowable for the additional features that each recites.

*Dependent Claims 7 and 9-10*

**[0024]** Claims 7 and 9-10 ultimately depend from claim 6. Accordingly, Applicant incorporates the reasoning presented above in response to the rejection of claim 6

under 35 U.S.C. § 103(a). Thus, Applicant respectfully submits that the cited documents of Vaitekunas and Firester do not teach or suggest every element of claim 6.

**[0025]** Moreover, the deficiencies of the cited documents to Vaitekunas and Firester are not remedied by Li. Li discloses "virtual display" wall that can accommodate the contents drawn on a regular CRT. (Li, Page 34, Column 2, Paragraph 1). However, Li is silent with respect to the elements of claim 6 that are not taught or suggested by Vaitekunas and Firester. Consequently, since claim 6 is allowable over the cited documents, Claims 7 and 9-10 are also allowable over the cited documents for at least their dependency from an allowable base claim. These claims may also be allowable for the additional features that each recites.

#### Independent Claim 18

**[0026]** Applicant submits that the Office has not made a *prima facie* showing that independent Claim 18 is obvious over Vaitekunas, in view of Firester, and further in view of Li. Applicant submits that the cited documents do not teach or suggest the following features of this claim. Claim 18, as amended, recites (with emphasis added):

18. A large display configuration computer comprising:

a configuration to:

advertise the availability of a large display, the large display comprising a plurality of small display devices, but advertised as a contiguous large display;

receive, over a computer network, video data formatted for display in its entirety on the large display that comprises the plurality of small displays;



receive configuration data from a plurality client computers each having an associated display device, the configuration data received from each client computer including a physical location and a display resolution of the display device associated therewith; and

reformat the video data formatted for the large display for display across the display devices associated with the plurality of client computers, the *reformatting of the video data* for the large display including dividing the video data *into distinct video data portions that may be individually rendered on the display devices associated with the plurality of client computers.*

**[0027]** Specifically, Vaitekunas does not teach or suggest, "*receive, over a computer network, video data formatted for display in its entirety on the large display that comprises the plurality of small displays,*" as recited in claim 18. (Emphasis added).

**[0028]** Instead, Vaitekunas discloses an "advertising bill board system 20" that includes a plurality of "content-display units 25". However, Vaitekunas discloses that each of the "content-display units 25" display its own video data, not video data that is formatted for display in its entirety on a large display that is made up of the "content-display units 25." This is apparent in the following section of Vaitekunas, which states (with emphasis added):

The advertising billboard system 20 may also comprise a plurality of display controllers 26, 27, 28, 29 in communication with a plurality of content-display units 25, each one from the plurality of display controllers 26, 27, 28, 29 having a type identifier, wherein *each of the display controllers 26, 27, 28, 29 selects dynamic-content 70 for display on its content-display unit 25* as a function of its type identifier. For example,

display controller 26 may have a type identifier of *highway billboard*, display controller 27 may have a type identifier of *shopping mall kiosk*, display controller 28 may have a type identifier of computer monitors on a local area network, and display controller 29 may have a type identifier of a *semi-trailer driving past "JOE's Diner"*.

(Vaitekunas, Paragraph 40, 3-16).

**[0029]** Thus, Vaitekunas discloses that each of its plurality of "content-display units 25" (small displays) display *different* content that is selected for *different* locations (*e.g.*, highway billboard, shopping mall kiosk, semi-trailer, etc.). As a result, Vaitekunas cannot teach or suggest, "receive, over a computer network, video data formatted for *display in its entirety on the large display* that comprises the plurality of small displays," as recited in claim 18. (Emphasis added).

**[0030]** Moreover, the deficiencies of Vaitekunas are not remedied by Firester and Li. Firester discloses the reformatting and distribution of video data to one or more displays. (Office Action, Page 3, Paragraphs 4-5; Firester, Abstract). Li discloses "virtual display" wall that can accommodate the contents drawn on a regular CRT. (Li, Page 34, Column 2, Paragraph 1). However, Firester and Li are silent with respect to *receive, over a computer network, video data formatted for display in its entirety on the large display* that comprises the plurality of small displays," as recited in claim 18. (Emphasis added).

**[0031]** Consequently, for at least the foregoing reasons, the cited documents do not teach or suggest all of the elements and features of claim 18. Accordingly, Applicant respectfully requests that the rejection of this claim be withdrawn.

### Dependent Claims 19-20

**[0032]** Claims 19-20 ultimately depend from independent Claim 18. As discussed above, Claim 19-20 is allowable over the cited documents. Therefore, Claims 19-20 are also allowable over the cited documents for at least their dependency from an allowable base claim. These claims may also be allowable for the additional features that each recites.

### Dependent Claim 3

**[0033]** Claim 3 stands rejected under 35 U.S.C. § 103(a) as allegedly being obvious over Vaitekunas, in view of Firester and further in view of Li and Ellis. Claim 3 ultimately depends from claim 1. Accordingly, Applicant incorporates the reasoning presented above in response to the rejection of claim 1 under 35 U.S.C. § 103(a). Thus, Applicant respectfully submits that the cited documents of Vaitekunas and Firester do not teach or suggest every element of claim 1. (Emphasis added).

**[0034]** Moreover, the deficiencies of the cited documents to Vaitekunas and Firester are not remedied by Li. Li discloses "virtual display" wall that can accommodate the contents drawn on a regular CRT. (Li, Page 34, Column 2, Paragraph 1). Ellis discloses that each quadrant of a plasma panel may have a different device address. (Ellis, Column 4, Lines 30-45, Column 12, Lines 30-48).

**[0035]** However, Li and Ellis are silent with respect to the elements of claim 1 that are not taught or suggested by Vaitekunas and Firester. Consequently, since claim 1 is allowable over the cited documents, claim 3 is also allowable over the cited documents for at least its dependency from an allowable base claim. Claim 3 may also be allowable for the additional features that it recites.

Dependent Claim 8

**[0036]** Claim 8 stands rejected under 35 U.S.C. § 103(a) as allegedly being obvious over Vaitekunas, in view of Firester and Li and further in view of Ellis and Sakai. Applicant respectfully traverses the rejection. Claim 8 ultimately depends from claim 6. Accordingly, Applicant first incorporates the reasoning presented above in response to the rejection of claim 6 under 35 U.S.C. § 103(a). Thus, Applicant respectfully submits that the cited documents of Vaitekunas and Firester do not teach or suggest every element of claim 6. (Emphasis added).

**[0037]** Moreover, the deficiencies of the cited documents to Vaitekunas and Firester are not remedied by Li, Ellis, and Sakai. Li discloses "virtual display" wall that can accommodate the contents drawn on a regular CRT. (Li, Page 34, Column 2, Paragraph 1). Ellis discloses that each quadrant of a plasma panel may have a different device address. (Ellis, Column 4, Lines 30-45, Column 12, Lines 30-48). The disclosure of Sakai is related to the generation of textures and patterns for mapping onto an object. (Sakai, Column 3, Lines 30-49).

**[0038]** However, Li, Ellis, and Sakai are silent with respect to the elements of claim 6 that are not taught or suggested by Vaitekunas and Firester. Consequently, since claim 6 is allowable over the cited documents, claim 8 is also allowable over the cited documents for at least its dependency from an allowable base claim. Claim 8 may also be allowable for the additional features that it recites.

**[0039]** Specifically, the Office cites Sakai as teaching, "determining a large contiguous display resolution comprises *summing the screen resolutions of the small*

*displays according to a location of each the small displays within the large contiguous display," as recited in claim 8. (Emphasis added; Office Action, Page 13, Paragraph 4).*

**[0040]** Applicant respectfully disagrees. The cited section of Sakai refers to Figure 26 of Sakai and discloses determining the resolution of pattern for a rectangular region that surrounds a spherical object. (Sakai, Column 27, Lines 50-67). This is apparent in the section of Sakai that is immediately above the cited section of Sakai (Column 27, Lines 65-67, Column 28, 1-15), as it states (with emphasis added):

On this occasion, the projection image 2111B of the subject sphere 2111 is obtained with the parameters of *the circle calculated by the projection processor 21231 before.*

Subsequently, *a rectangular region (a region indicated by broken lines in FIG. 26) which contains the projection region of the sphere is found as having the vertices of its diagonal line at coordinate points (272, 192) and (368, 288).*

(Sakai, Column 27, Lines 50-64).

**[0041]** Thus, even assuming, *in arguendo*, that the "projection 2111B" of Sakai is equivalent to a "large display" as recited in claim 8, Figure 26 of Sakai only shows "project 2111B" as encompassing a single small display (*e.g.*, the single subject sphere 2111), not multiple "small displays", as recited in claim 8. Thus, Sakai does not teach or suggest, "determining a large contiguous display resolution comprises *summing the screen resolutions of the small displays* according to a location of each the small displays within the large contiguous display," as recited in claim 8. (Emphasis added). Accordingly, claim 8 is further allowable.

**[0042]** In closing, Applicant's decision not to discuss the differences between the cited art and each dependent claim should not be considered as an admission that Applicant concurs with the conclusions set forth in the Office Action that these dependent claims are not patentable over the disclosure in the cited references. Similarly, Applicant's decision not to discuss differences between the prior art and every claim element, or every comment set forth in the Office Action, should not be considered as an admission that Applicant concurs with the interpretation and assertions presented in the Office Action regarding those claims. Indeed, Applicant believes that all of the dependent claims patentably distinguish over the references cited. Moreover, a specific traverse of the rejection of each dependent claim is not required, since dependent claims are patentable for at least the same reasons as the independent claims from which the dependent claims ultimately depend.

**[0043]** Furthermore, due to the Applicant's earnest belief that the claims, as rejected under Section 103(a), are allowable because their recited elements are not taught or suggested in the cited references, Applicant will not address motivation to combine with respect to the claims during this response. However, Applicant hereby reserves the right to further challenge motivation to combine the cited references.

## Conclusion

[0044] Applicant submits that all pending claims are in condition for allowance. Applicant respectfully requests reconsideration and prompt issuance of the application. If any issues remain that prevent issuance of this application, the Examiner is urged to contact the undersigned representative for the Applicant before issuing a subsequent Action.

Respectfully Submitted,

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Dated: \_\_\_\_\_

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